

# Exhibit A

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**UNITED STATES, *et al.*,**

Plaintiffs,

v.

**GOOGLE LLC,**

Defendant.

**Civil Action No. 1:23-cv-00108-LMB-JFA**

**DECLARATION OF MARA BOUNDY IN SUPPORT OF GOOGLE LLC'S  
MEMORANDUM OF LAW IN OPPOSITION TO PLAINTIFFS' MOTION TO  
COMPEL INTERNAL ANALYSES OF REMEDY FEASIBILITY**

I, Mara Boundy, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am an attorney on the Regulatory Affairs team at Google LLC. I have held this role since November 2021, and have been employed by Google since November 2020. My duties and responsibilities include responding to investigations and litigations brought by domestic and foreign competition authorities, including the above-captioned matter.

2. I submit this declaration in support of Google's Memorandum of Law in Opposition to Plaintiffs' Motion to Compel Internal Analyses of Remedy Feasibility in *United States v. Google LLC*, No. 1:23-cv-00108-LMB-JFA (E.D. Va.) (the "Motion to Compel").

3. The contents of this declaration are true and correct to the best of my knowledge, information, and belief, and are based on my personal knowledge and review of relevant records. If called upon as a witness in this action, I could and would testify competently thereto.

4. Google's advertising technology business ("ad tech") has been the subject of investigations, legal proceedings, and litigation, including those commenced by the European Commission, the U.K. Competition and Markets Authority, and the Antitrust Division of the United States Department of Justice ("Competition Authorities") among others.

5. Part of my role and responsibilities at Google involves the response to the Competition Authorities' investigations and litigation, including oversight of outside counsel, coordination of Google's defenses and responses to those investigations and litigation, and evaluation of possible remedies and the potential for resolution of the Competition Authorities' investigations and litigation.

6. In 2021, in response to certain of the ongoing investigations by the Competition Authorities, Google employees, at the direction of counsel, prepared analyses to assist Google's in-house and outside counsel in assessing the potential for resolution of those investigations. That work continued at intervals throughout 2022. These analyses are in addition to those described in the Declaration of Theodore Lazarus. Dkt. 284-30.

7. In early 2023, Plaintiffs commenced this litigation against Google. Several months after Plaintiffs commenced this litigation, the European Commission sent Google its Statement of Objections.

8. Following the commencement of this litigation and the issuance of the European Commission's Statement of Objections, Google employees, at the direction of counsel, prepared analyses at various points in 2023 and 2024 to assist Google's in-house and outside counsel in assessing the potential for resolution of the Competition Authorities' investigations and this litigation.

9. I, in conjunction with other in-house counsel, directed, provided legal guidance, and oversaw the preparation of the analyses in response to the Competition Authorities' investigations and litigation. Outside counsel—including Jeannie Rhee and Rush Atkinson of Paul, Weiss, Rifkind, Wharton & Garrison; Daniel Bitton and Russell Steinhil of Axinn, Veltrop & Harkrider; Eric Mahr and Jan Rybnicek of Freshfields Bruckhaus Deringer; and Jordan Ellison and Tina Zhuo of European outside counsel Slaughter & May—also directed, provided legal guidance, and supervised the preparation of the analyses, which were prepared for the purpose of analyzing the potential for a possible resolution of the Competition Authorities' investigations and litigation.

10. The analyses contain and reflect input from counsel as they either were prepared at the direction, or pursuant to a request, of counsel or otherwise incorporate information provided by counsel, including counsel's strategies or thought processes concerning the investigations and litigation.

11. The analyses inform Google's legal strategy in defending and responding to, including the potential for resolution of, the Competition Authorities' investigations and litigation.

12. But for the Competition Authorities' investigations and litigation, the analyses and work described would not have been prepared or created.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 28th day of May, 2025 in San Francisco, California.

